

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PHARO GAIA FUND, LTD. and PHARO
MACRO FUND, LTD., and PHARO
TRADING FUND, LTD.,

Plaintiffs,

v.

THE BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 20-cv-8497 (AT)
Related to 18-cv-11940 (AT)

DECLARATION OF MATTHEW D. MCGILL

Pursuant to 28 U.S.C. § 1746, I, Matthew D. McGill, declare and state as follows:

1. I am an attorney with Gibson, Dunn & Crutcher LLP, counsel for Plaintiffs Pharo Gaia Fund, Ltd. Pharo Macro Fund, Ltd., and Pharo Trading Fund, Ltd. (“Plaintiffs”) in the above-referenced matter.
2. I submit this declaration on behalf of Plaintiffs in support of Plaintiffs’ Motion for Relief Pursuant to 28 U.S.C. § 1610(c), dated June 21, 2023.
3. On October 25, 2021, this Court entered default judgment in favor of Plaintiffs (the “Default Judgment”). Dkt. 32. Attached as Exhibit 1 hereto is a true and correct copy of the Default Judgment.
4. The Default Judgment has not been satisfied and, as of the date of this declaration, the Default Judgment remains outstanding. To my knowledge, Defendant Bolivarian Republic of Venezuela (“Venezuela”) has initiated no discussion concerning whole or partial satisfaction of the Default Judgment.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 22, 2022

/s/ Matthew D. McGill

Matthew D. McGill